Central Bank of Kenya

Guidance Note on Cross-Border Movement of Physical Cash

September 2025

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PART I: PRELIMINARY

1.1 Title

Guidance on Cross-Border Movement of Physical Cash.

1.2 Authorisation

This Guidance on the Cross-Border Movement of Physical Cash is issued under section 36C (1) (d) of the Proceeds of Crime and Anti-Money Laundering Act, which empowers the Central Bank of Kenya to guide institutions on anti-money laundering, combating the financing of terrorism and countering proliferation financing issues.

1.3 Application

This Guidance applies to institutions licensed under the Banking Act.

1.4 Definitions

1.4.1. False declaration

This refers to a misrepresentation of the value of currency or bearer negotiable instruments (BNIs) being transported, or a misrepresentation of other relevant data which is required for submission in the declaration or otherwise requested by the authorities. This includes failing to make a declaration as required.

1.4.2. Seize

This means to prohibit the transfer, conversion, disposition, or movement of property based on an action initiated by a competent authority or a court under a freezing mechanism. However, unlike a freezing action, a seizure is affected by a mechanism that allows the competent authority or court to take control of specified property. The seized property remains the property of the natural or legal person(s) that holds an interest in the specified property at the time of seizure, although the competent authority or court will often take over possession, administration, or management of the seized property[1].

1.4.3. Bearer Negotiable Instruments

This includes monetary instruments in bearer forms such as traveller's cheques, negotiable instruments (including cheques, promissory notes, and money orders) that are either in bearer form, endorsed without restriction, made out to a fictitious payee, or otherwise in such a form that title thereto passes upon delivery; incomplete instruments (including cheques, promissory notes, and money orders) signed, but with the payee's name omitted.

In relation to Terrorism Financing or Money Laundering: when used to describe currency or BNIs, it refers to currency or BNIs that are:

(i) the proceeds of, or used in, or intended or allocated for use in, the financing of terrorism, terrorist acts or terrorist organisations; or

(ii) laundered proceeds from money laundering or predicate offences, or instrumentalities used in or intended for use in the commission of money laundering or predicate offences[2].

[1] *Source: FATF Glossary*

[2] *Source: FATF Recommendations*

PART II: STATEMENT OF POLICY

2.1. Background

Kenya's strategic geographical location and dynamic regional trade environment make the country particularly vulnerable to cross border risks, especially given its role as the financial, communications and transportation hub of East Africa.

Kenya has established legal and regulatory frameworks in line with international standards, particularly the Financial Action Task Force (FATF) Recommendation 32 which deals with cash couriers. This is aimed at addressing the vulnerabilities associated with the cross-border transportation of physical cash.

The enactment of the Proceeds of Crime and Anti-Money Laundering Act (POCAMLA) and POCAML Regulations changed the legal and regulatory landscape governing the cross-border monitoring of cash. Under the POCAMLA, the responsibility of monitoring the physical movement of cash is vested with the Financial Reporting Centre (FRC) and the Customs Division of the Kenya Revenue Authority (KRA).

2.2. Money Laundering (ML) and Terrorist Financing (TF) through cross-border movement of physical cash

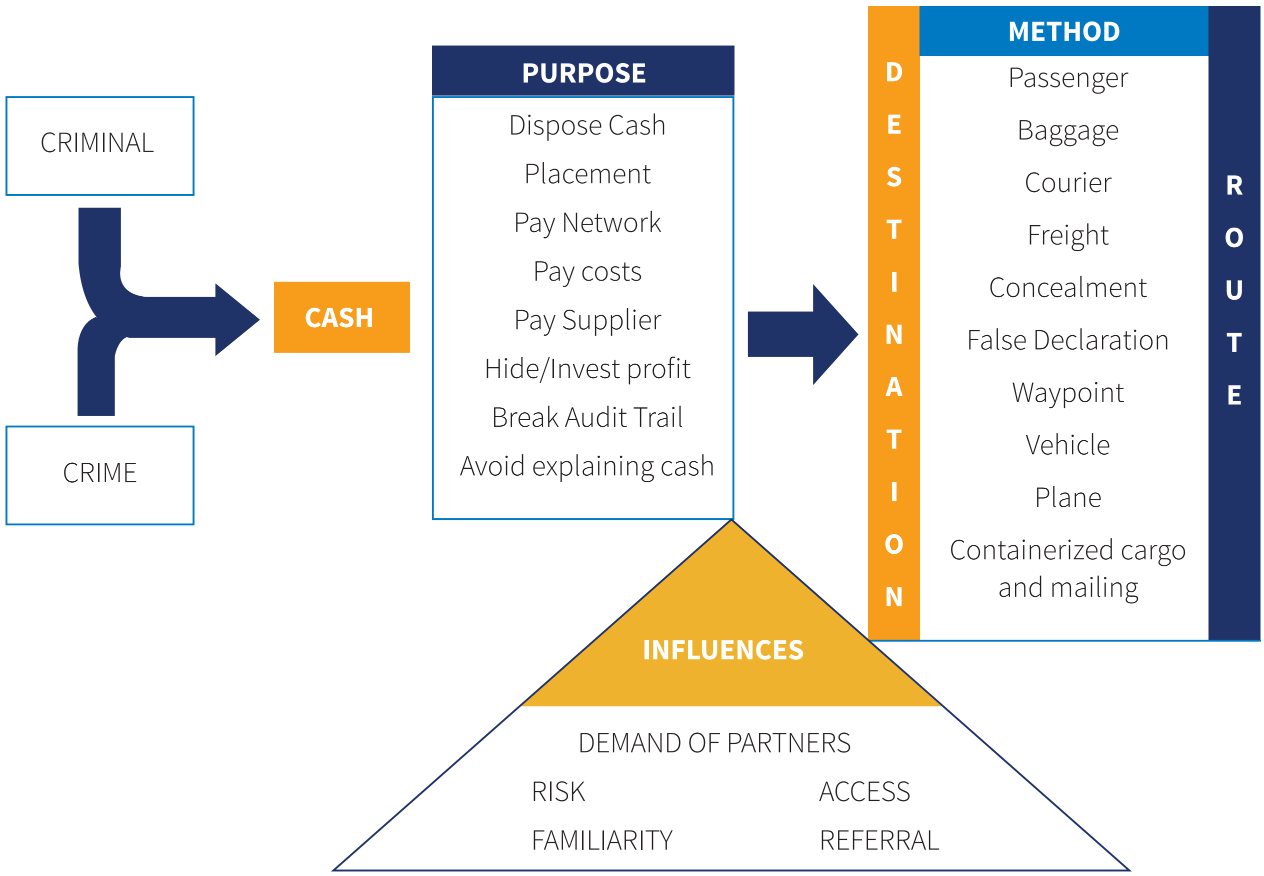
Money laundering, Terrorism Financing and Proliferation Financing through cross-border movement of physical cash involves transferring illicit funds across national boundaries to disguise their origins or to support terrorist and proliferation activities. Cross-border transportation of cash is one of the most widespread methods of money laundering.

Ordinarily, the objective of criminals seeking to launder money by physically transporting it across borders can be summarized as **raising, moving, storing** and **using** funds[3]. There are numerous factors which influence why criminally derived cash is moved from one jurisdiction to another and which are in-tandem with the criminal's requirement to raise, move, store and/or use the proceeds of criminal activity.

Most of the factors linked to movement of cash in/out of the country include evasion of the regulatory regime in a country and the disruption of audit trail. Other factors include capital flight and facilitation of the cash movement through Politically Exposed Persons (PEPs).

[3] *'Raise, Move, Store, Use' is an explanation developed by United Kingdom (UK) Law enforcement to describe processes in a number of financial crimes, including terrorism financing and money laundering.*

The graph below illustrates the criminal decision-making process which influences the purpose and method of cash movement[4].



- **Crime:** The process starts with the criminal committing the crime that generates the cash.
- **Purpose:** The criminal must then decide what he wants to do with the cash, which may include paying the money laundering networks, paying his supplier for more illicit goods, investing the profits, among others.
- **Destination:** the destination is dictated by the purpose. It is only once the purpose is decided that the destination becomes apparent.
- **Method:** involves the decision on how to get the cash to the destination; through cash courier, concealment in a vehicle, use of freight among others. Closely associated and interrelated to the method and destination, is the **Route** chosen.

Other factors including the risks of choosing one route and destination over another, the availability of/access to a particular method, familiarity with a system that has previously worked, among others, will have an influence at all stages of the decision-making process. Throughout the process, the cash will follow a route dependent on the decisions of the criminal; however, ultimately it will re-enter the legitimate financial system and will be ‘re-cycled.

[4] *Source: https://www.fatf-gafi.org/content/dam/fatf-gafi/reports/money-laundering-through-transportation-cash*

2.3. Role of Commercial Banks in the Physical Cross-Border Transportation of Cash

The role of banks in stemming the illicit cross-border movement of cash is multifaceted, involving both operational and regulatory responsibilities. The roles are particularly important in preventing illicit financial flows and ensuring compliance with AML/CFT/CPF measures. These include:

I. **Customer Due Diligence**: Banks are required to perform Customer Due Diligence (CDD) and, where necessary, Enhanced Due Diligence (EDD), particularly when dealing with customers that are involved in:

- Large cash deposits or withdrawals linked to foreign travel or trade.
- Services related to money or value transfer across borders.

Banks should verify the source of funds and ensure the customer is not acting on behalf of a third party without disclosure.

ii. **Monitoring and Reporting of Suspicious Transactions**: Banks must monitor customer transactions for unusual or suspicious activity related to cross-border cash movements. Where appropriate, they are required to file Suspicious Transaction Reports (STRs) with the Financial Reporting Centre (FRC), particularly when:

- Large or unexplained amounts of cash are deposited or withdrawn before or after travel.
- Patterns suggest structuring (smurfing) to avoid detection or declaration thresholds.
- The source or destination of funds is linked to high-risk jurisdictions.

iii. **Declaration and Disclosure Facilitation:** While individuals are typically required to declare cross-border physical cash movements themselves, banks play a role in:

- Advising clients on applicable declaration thresholds (USD 10,000 or equivalent).
- Reporting any known non-compliance to the authorities if clients seek to evade declarations.
- Ensuring that cross-border cash courier services they provide or support, comply with regulatory requirements.

iv. **Collaboration with Authorities:** Banks should cooperate with regulators, customs authorities, and the FRC, providing information when required for investigations into money laundering, terrorism financing, or illicit cross-border cash flows. Banks can create cooperation and collaboration mechanisms with regional bodies where this is feasible.

v. **Record-Keeping:** Banks must maintain records of cross-border cash-related transactions, including:

- Identity of the customer.
- Amount and currency of the transaction.
- Date and nature of the transaction.
- Any relevant travel or shipping documents (when known).

These records must be kept for a minimum of seven years, as per Kenyan AML/CFT/CPF law and Regulations.

2.4. Purpose

The main objective of this Guidance is to assist financial institutions (FIs) licensed by CBK under the Banking Act, to comply with the requirements regarding the cross-border movement of cash as set out in the Proceeds of Crime and Anti-Money Laundering Act (POCAMLA) and its attendant Regulations. In particular, the Guidance Note aims to:

- Ensure consistent implementation of measures to detect and deter illicit cross-border cash flows.
- Enhance compliance with national and international legal frameworks.
- Strengthen co-ordination between banks, regulators, customs and Law Enforcement Agencies.

For purposes of this Guidance, Physical cross-border transportation refers to any in-bound or out-bound physical transportation of currency or BNIs from one country to another country. The term includes the following modes of transportation:

a) Physical transportation by a natural person, or in that person's accompanying luggage or vehicle.

b) Shipment of currency or BNIs through containerized cargo.

c) The mailing of currency or BNIs by a natural or legal person.

This Guidance is not intended to be used in place of the Kenyan AML/CFT/CPF legislation but should be read in conjunction with the relevant provisions of the said laws.

2.5. Scope

This Guidance draws from:

- International Standards: The Financial Action Taskforce (FATF) Recommendations.
- Domestic Regulations: Proceeds of Crime and Anti-Money Laundering Regulations.
- Typology Studies on the Cross- Border Physical Movement of Cash.
- Kenya's Mutual Evaluation Report issued by the Eastern and Southern Africa Anti-Money Laundering Group (ESAAMLG) in 2022.
- Data and Trends from CBK's survey on Cross Border Movement of Cash by Commercial Banks.

2.5.1. FATF Recommendation 32

The FATF Recommendation 32 on Cash Couriers emphasises the need for countries to implement a declaration/disclosure system for incoming and outgoing cross-border transportation of currency and BNIs.

In particular, the Recommendation specifically aims at ensuring that countries have measures in place to:

i. Detect the physical cross-border transportation of currency and BNIs.

ii. Stop or restrain currency or BNIs that are suspected to be related to TF or ML.

iii. Stop or restrain currency or BNIs that are falsely declared or disclosed.

iv. Apply appropriate sanctions for making false declaration(s) or disclosure(s).

v. Enable the confiscation of currency or BNIs related to TF and ML.

The "Glossary of specific terms used in this Recommendation" in the Interpretive Note to Recommendation 32, confirms that the scope includes shipment through containerized cargo and mailing.[i]

2.5.2. The Proceeds of Crime and Anti-Money Laundering Regulations (POCAMLR)

POCAML Regulation 10 (1) on Cross border Conveyance of Monetary Instruments stipulates the following:

- Any person intending to convey into or out of Kenya monetary instruments equivalent to or exceeding US$10,000 or its equivalent in Kenya shillings or any other currency, shall before doing so declare the particulars of those monetary instruments to a customs officer at the port of entry or exit.
- Where the customs officer has reason to suspect that the person has not made a true declaration or has failed to declare the monetary instruments, the customs officer shall require that person to produce and show to the customs officer all the monetary instruments in his or her possession.
- For purposes of conducting his or her duties under the regulation, the duties and powers of the customs officer to search and arrest under the East African Community Customs Management Act, 2004, shall apply.

2.5.3. International Studies on the Cross-Border Movement of Physical Cash

The Guidance examined some of the studies conducted by international bodies on the challenges encountered in implementing measures for cross-border movement of physical cash. Some of the studies examined include:

a) **The joint Financial Action Task Force/ Middle East and North Africa Financial Task Force (FATF/ MENAFATF)** study report which analysed the input provided by several countries to identify methods and techniques that criminals use to transport funds across the border.

b) **Caribbean Financial Action Task Force (CFTATF)** Typology Report on Movement of Cash and Negotiable Instruments.

c) **FATF International Best Practices** on Detecting and Preventing the illicit cross-border transportation of cash and bearer negotiable instruments.

d) **Europol Strategic Report** on the use of cash by Criminal Groups as a facilitator for ML.

Key highlights of the studies are as follows:

a) Criminally derived cash, physically transported across international borders, originates from an extremely wide range of predicate offences. However, the most prevalent predicate offences include drug trafficking, smuggling and tax fraud.

b) The currencies most frequently encountered in criminal cash seizures is the US dollar, followed by the Euro.

c) The bulk of the cash seized was linked to drug trafficking.

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[i] ***Glossary of specific terms used in this Recommendation Physical cross-border transportation*** *refers to any in-bound or out-bound physical transportation of currency or BNIs from one country to another country. The term includes the following modes of transportation: (1) physical transportation by a natural person, or in that person's accompanying luggage or vehicle; (2) shipment of currency or BNIs through containerized cargo or (3) the mailing of currency or BNIs by a natural or legal person.*

d) There exist legislative frameworks comprising of disclosure/declaration mechanisms within the jurisdictions surveyed, however, enhanced enforcement is conducted on passengers entering respective jurisdictions as opposed to those exiting.

e) Jurisdictions surveyed identified the need for real-time information sharing mechanism within which cash seizure information can be shared with key law enforcement authorities (LEAs).

One of the typology studies provided examples of some of the techniques that criminals use the cash declaration and/or disclosure systems to their advantage. These include:

- **Example 1: Use of Cash Declarations to create an illusion of legitimacy to criminal cash:** Countries reported numerous examples of persons regularly importing large amounts of cash from jurisdictions linked to drug trafficking. The individual completes a cash declaration on entry into a country, then takes the cash to a bank. When challenged by the bank, the individual produces the cash declaration, which the bank staff accept as 'proof' that the cash must have a legitimate origin as it was declared to the authorities and not seized. Cash derived from other criminality may also be accurately declared to circumvent local requirements in respect of banking the cash.

- **Example 2: Cash declarations used to create a false record of import or export:** A cash declaration form is completed and submitted, but not checked at the point the individual enters a country. No cash was imported or exported, rather, the criminal goes to a bank and pays in the cash derived from crime in the destination country to the value of the false declaration, which is accepted as legitimate in the same manner as the previous example. Additionally, a passenger declares cash in, for example, three currencies, but only two are available. The missing third currency is then 'made up' from criminal cash in the destination country.

- **Example 3: Re-use of Cash Declarations forms:** Cash is genuinely imported or exported and is declared accurately and correctly. The criminal then takes possession of additional cash derived from criminal activities in the destination country and uses the same declaration in different banks. The use of a declaration multiple times creates an illusion of legitimacy to the additional criminal cash. The bank is unable to detect that the declaration form has been re-used since it only examined the cash declaration form but did not retain a copy or take note of the report details.

- **Example 4: Incomplete Cash Declarations:** The criminal declares a large amount of cash at a border control and is required to produce the cash by the authorities. The correct amount of cash is produced, counted and the authorities are satisfied with the declaration and the subject is allowed to proceed. However, the failure by the authorities to search the subject and his effects, leads to the subject proceeding with additional cash in his possession that was not declared. The subject is later challenged by the authorities away from the border but verifiably states that he made a cash declaration which was verified satisfactorily by the border control authorities.

- **Example 5: Cash declared at one end of a journey but not the other.** In this situation, the subject may correctly declare the cash on leaving a jurisdiction, for example at an airport, where the authorities do not routinely check declarations. The individual has no intention of declaring the cash inbound at his destination as the cash has a criminal origin which he intends to put to criminal use. However, the individual is intercepted at the destination and the undeclared cash is discovered. The subject then claims the failure to declare the cash was an oversight and uses the declaration made at the beginning of the journey as 'insurance', effectively giving the cash an illusion of legitimacy.

The following common typologies were observed in the reviewed studies:

- Bank staff appear to have limited understanding of the systems in place and an insufficient appreciation on how cash can be made to appear legitimate by the use of a cash declaration form.
- Emphasis on the need for greater international co-operation and data sharing among countries, particularly those who share land boundaries or ties such as ethnicity or frequency of travel by citizens between them.

2.5.4. The Mutual Evaluation of Kenya (MER) Report 2022

A mutual evaluation of Kenya's anti-money laundering, combating the financing of terrorism and proliferation financing (AML/CFT/CPF) legal and institutional system was conducted by the ESAAMLG from 2021 and the report published in 2022.

The report recognized that Kenya has adopted and implements a monetary declaration system for all physical cross-border transportation of currency and BNIs. However, cross-border transportation of currency or BNIs by mail and cargo was not covered.

The following key deficiencies were noted with regard to effectiveness:

- The total number of cross-border cash declaration reports received by the FRC was inconsistent with the volume of travellers entering and exiting Kenya.
- Neighbouring countries such as Uganda, Rwanda, South Sudan, Somalia, and Democratic Republic of Congo (DRC) largely rely on Kenya's financial system to facilitate trade payments. This did not reflect in the total number of cash declarations filed with the FRC.
- Under the POCAMLA, any person who files a false declaration to an authorised officer and is convicted of the offence, is liable to a fine not exceeding ten percent of the amount of cash involved in the declaration. The penalties were assessed as not dissuasive, on the basis that criminals would factor in the ten percent as 'cost of doing business'. In addition, the penalties for persons involved only applied to failure to declare.
- Measures to monitor and control cross-border movement of currency and BNIs to or from other countries have been focused mainly on airports. In addition, the reports are not analyzed critically to establish links to ML or TF.

In summary, the MER rated Kenya Partially Complaint (PC) with Recommendation 32 on the basis that cross-border currency declaration requirements do not apply to currency or BNIs transported through mail or cargo. In addition, false declarations are not subject to proportionate and dissuasive sanctions.

2.5.5. CBK Survey on Cross-Border Movement of Cash

CBK conducted a survey in April 2025, aimed at gathering insights from commercial banks and Mortgage Finance Companies regarding their practices, challenges, and effectiveness in managing and reporting the cross-border movement of cash. The survey focused on banks' identification of cash couriers, the implementation of cash declaration systems, and the detection and reporting of cash smuggling.

Key findings of the survey included:

- 39 percent of licenced commercial banks in Kenya transport physical cash across the border.
- The main reason for cross border cash movement is repatriation of foreign currency and promoting operational efficiency by meeting liquidity needs of foreign subsidiaries.
- Main mode of transport of physical cash was identified as air cash couriers, with the main destination being the United Kingdom.
- The main currencies transported physically across borders include United States Dollars, Euros and Great Britian Pounds.
- Most banks establish the legitimacy of cash to be transported across borders mainly through Know Your Customer (KYC) and Customer Due Diligence (CDD), use of counterfeit money checker machine, sourcing only from globally licensed currency notes suppliers and seeking regulatory approvals from originating country.
- Majority of the banks filed cash declaration reports related to the cross-border transportation of cash.
- The main challenges faced by banks in managing cross-border physical cash flows include lack of technological solutions and insufficient cooperation from clients or other institutions.
- The ML/TF risks arising from cross-border transportation of physical cash included difficulties in traceability of physical cash, weak cross-border controls, tax fraud, the use of informal value transfer services such as Hawala, third-party risk and sovereign risk.

2.6. Responsibility

The board of directors and senior management of commercial banks are expected to formulate and implement, policies and procedures, transaction monitoring, training of employees and internal guidelines for cross border movement of physical cash, including having adequate preventive measures to combat ML and TF associated with the movement of physical cash across borders.

PART III: SPECIFIC REQUIREMENTS

3.1. Red Flags and Typologies

Banks should remain vigilant, including employing effective transaction monitoring systems to detect anomalies in transactions involving cross-border movement of physical cash. The Guidance outlines some of the red flags that would form grounds of suspicion in cross-border movement of cash:

- Customer has a connection with a risk area or jurisdiction. High risk jurisdictions include jurisdictions with specific crime issues; jurisdictions lacking customs authorities/free ports; jurisdictions with reduced presence of customs authorities/ free trade zones; jurisdictions with high levels of corruption; and jurisdictions with weak AML/CFT/CPF regulations.
- The customer demonstrates excessive or unusual interest in the declaration/disclosure system or procedure, particularly where it is inconsistent with their profile or transaction behaviour.
- Customer's purpose of travel is unknown or inconsistent with his/her profile.
- Purchase and sale of foreign currency in cash, frequently carried out by persons or businesses that are not authorised to carry out this activity.
- Purchase and sale of foreign currency in cash with local currency that shows signs of structuring.
- Persons who frequently leave the country with the same destination, declaring the exit of foreign currency in cash. This activity does not correspond to their economic profile.
- Multiple individual travellers appear to be involved in similar movements or show similar travel patterns that mirror smuggling patterns of illegal goods and human trafficking routes.
- Unexplained source of funds.
- Use of third parties to transport large amounts of physical cash across borders with the intention to conceal the true beneficiary of the cash in transit.
- Frequent transfer of cash (physical or through bank transfers) to border areas of the country.

The list is not exhaustive and only provides a guide to banks and mortgage Finance Company in the identification of suspicious activity/transactions related to cross-border cash movement.

3.2. Preventive Measures

In addition to the measures in place to prevent illicit financial flows, banks are required to tighten the following specific control procedures:

3.2.1. Customer Due Diligence and Enhanced Due Diligence

Banks are required to adhere to the following CDD and EDD measures:

- Apply enhanced due diligence for customers involved in the import/export, foreign exchange or cash-intensive businesses. These include identifying the owner of cash, the ultimate beneficiary, the origin of the funds, the purpose for which it will be used, among other elements. The source of funds should be commensurate with the customer's risk profile.

- Request for documentary evidence for cross-border cash transfers exceeding USD 10,000 or equivalent, including a copy of the cash declaration form stamped at the customs, source of funds, purpose of funds, travel information including country of origin/destination, among others.
- The existence of a declaration/disclosure should not be a substitute for banks to verify the source of funds or conduct regular or enhanced ongoing due diligence, or a ground to apply simplified due diligence.

3.2.2. Transaction Monitoring and Reporting

- Implement automated red flag detection systems to monitor:
  - Frequent Large Cash deposits near border areas.
  - Use of multiple accounts to split large deposits (structuring).
  - Transactions involving offshore jurisdictions with weak AML/CFT controls.
  - Customer transactions patterns for possibility of transportation of illicit cash flow across borders, during major events in regional countries. Verify the source and purpose of funds and ensure the cash movement patterns align with the customer's profile
- File Cash Transaction Reports (CTRs) and monitor cross-border cash transactions for possible intended ML or TF. Suspicious Transaction Reports (STRs) should be filed with FRC in accordance with the reporting requirements under POCAML Regulations, 2023.

3.2.3. Staff Training and Internal Controls

- Train staff, especially in high-risk zones and borders, to detect and escalate suspicious activity relating to cross-border movement of cash. The training should also focus on measures to detect the methods employed by criminals in making cash appear legitimate using a cash declaration form.
- Develop and update intelligence-based typologies that keep the institution informed of trends in the ML/TF/PF environment. Such typologies should be incorporated into the staff training programmes.
- Have in place policies outlining procedures for facilitating cross border movement of physical cash including identification of cash couriers, cash declaration form requirements and monitoring for suspicious activity.
- Institute adequate preventive measures to combat ML, TF and PF risk arising from cross-border movement of physical cash.
- Maintain copies of cash declaration forms submitted by customers and ensure the forms are not re-used in subsequent transactions. Each cash declaration form submitted at the customs contains a unique reference number (Unique Consignment Reference), which banks can use to ensure that the declaration form is not re-used.
- The presence of a cash declaration form should not replace pertinent questions as regards the source of the funds, and why the cash was imported as cash rather than being banked overseas/sent by electronic transfer.

- In the absence of a framework for financial institutions to access or confirm cash declarations submitted by arriving passengers at ports of entry, banks should institute measures to confirm the authenticity of the declaration forms.
- Ensure information shared is timely, comprehensive, tailored to the needs of the regulators and law enforcement authorities, and includes all recorded data.
- Conduct regular audits and internal reviews to ensure compliance with reporting and record-keeping requirements.

In addition, banks are required to establish direct liaison channels with the regulators to ensure effective coordination and implementation of the requirements of Cross-Border Movement of Physical Cash.

PART IV: REPORTING TO CBK

CBK has enhanced the existing AML/CFT/CPF Quarterly return to capture specific aspects of Cross-Border Movement of Cash. Commercial Banks and Mortgage Finance Company will be required to submit to CBK, the revised quarterly AML/CFT/CPF return with the additional aspects of cross-border movement of cash as in the prescribed format attached herein as **Annex I**. Completed returns shall be submitted to the CBK within 10 business days from the end of each quarter.

Failure to complete and submit the required return is considered non-compliance with this Directive and may result in administrative sanctions in accordance with Section 49 of the Banking Act. Sanctions shall also be imposed for the submission of inaccurate, false or incomplete information to the CBK.

4.1. Effective Date

The effective date of this Guidance shall be effective September 15, 2025.

4.2. Clarifications

In the event of any query or clarification or comments, please contact:

The Director,

Bank Supervision Department

Central Bank of Kenya

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ANNEX I

INSTITUTION:	
FINANCIAL YEAR:	
START DATE:	
END DATE:	

CASH DECLARATIONS, STRs AND CTRs

1. Number of submitted Cross-Border Currency Declaration Reports.

Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec

2. Number of STRs reported on Cross-Border cash movement.

	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec
ML related STRs												
TF related STRs												

3. Cash Transactions.

A. CTRs

	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec
No of transactions above USD 10,000												
Total value of transactions above USD 10,000 in Ksh'000												

B. Cash Repatriation in Kshs '000

i) Cash repatriated into the country

	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec
USD												
EURO												
GBP												
YEN												
YUAN												
RAND												
OTHERS												

ii) Cash moved out of the Country

	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec
USD												
EURO												
GBP												
YEN												
YUAN												
RAND												
OTHERS												

JURISDICTIONS INVOLVED IN THE CROSS-BORDER MOVEMENT OF CASH

		Inbound/from		Outbound/To	
No.	County	No. of customers	Value (Ksh. '000)	No. of customers	Value (Ksh. '000)
1.	***UN Sanctioned Countries:***				
	North Korea				
	Iran				
	Mali				
	South Sudan				
	Central African Republic				
	Yemen				
	Guinea-Bissau				
	Libya				
	Eritrea				
	Lebanon				
	Democratic Republic of the Congo				
	Sudan				
	Somalia				
	Iraq				
2.	***Jurisdictions listed by FATF as high-risk/non-cooperative***				
	Iran				
	Democratic People's Republic of Korea				
	Myanmar				

		Inbound/from		Outbound/To	
No.	**County**	**No. of customers**	**Value (Ksh. '000)**	**No. of customers**	**Value (Ksh. '000)**
3.	***Designated Countries L.N 200 of 2015***				
	Somalia				
	Syria				
	Yemeni				
	Libya				
	Iraq				
	Afghanistan				
4.	***Jurisdictions under Increased Monitoring by FATF-Greylist*** [1]				
	Iran				
	Democratic People's Republic of Korea				
	Myanmar				
5.	Other jurisdictions assessed as higher ML/TF/PF risk by the institution. *(list separately)*				
6.	Selected regional countries				
	Tanzania				
	South Sudan				
	Uganda				
	Mozambique				
	Sudan				
7.	Frequent Cash Movement Corridors (specify)				

[1] *When the FATF places a jurisdiction under increased monitoring, it means the country has committed to resolve swiftly the identified strategic deficiencies within agreed timeframes and is subject to increased monitoring. This list is often externally referred to as the "grey list".*

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